

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

| | | |
|-------------------------------------|---|------------------------------------|
| IN RE: | : | BANKRUPTCY NO. 5:20-bk-01632 (RNO) |
| AMANDA LOPEZ-PEREZ AND ANTON PEREZ | : | |
| Debtor(s) | : | CHAPTER 7 |
| | : | |
| | : | |
| AMANDA LOPEZ-PEREZ AND ANTON PEREZ, | : | |
| Movant(s) | : | |
| | : | |
| ALLY FINANCIAL | : | |
| JOHN J. MARTIN, TRUSTEE | : | |
| Respondent(s) | : | |

**ANSWER OF ALLY FINANCIAL INC. TO DEBTOR'S MOTION FOR AUTHORITY
TO REDEEM PERSONAL PROPERTY UNDER 11 USC 722**

AND NOW, Ally Financial Inc., by and through its counsel, LAVIN, CEDRONE, GRAVER, BOYD & DiSIPIO hereby responds to Debtor's Motion for authority to Redeem Personal Property Under 11 USC 722 and in support thereof avers the following:

1. After reasonable investigation Ally is without knowledge or information sufficient to form a belief as to these averments therefore they are denied, and further denied as conclusions of law.
2. Admitted that Ally holds a security interest in the vehicle, the balance of the averments are denied as conclusions of law.
3. The averments of this paragraph are generally and specifically denied, and further denied as conclusions of law. By way of further answer, the value of the vehicle is \$13,200. Additionally Ally claims attorney's fees.

4. After reasonable investigation Ally is without knowledge or information sufficient to form a belief as to these averments therefore they are denied.

5. After reasonable investigation Ally is without knowledge or information sufficient to form a belief as to these averments therefore they are denied.

Wherefore it is respectfully requested that debtor's motion be denied.

LAVIN, CEDRONE, GRAVER, BOYD & DISIPIO

DATED July 27, 2020

By: s/ Regina Cohen
Regina Cohen, Esquire (RC-57272)
190 North Independence Mall West - Suite
500
6th and Race Streets
Philadelphia, PA 19106
Tel: (215) 351-7551; Fax: (215) 627-2551
Attorney for Ally Financial